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10	IN THE UNITED STATES DISTRICT COURT	
11	FOR THE DISTRICT OF ARIZONA	
12	United States of America	No. CD 10 00000 DHV DID (DME)
13	United States of America,	No. CR-19-00898-PHX-DLR (DMF)
14	Plaintiff, v.	UNITED STATES' SUPPLEMENTAL PETITION TO
15	David Allan Hankarın	REVOKE DEFENDANT
16	David Allen Harbour,	HARBOUR'S RELEASE PENDING TRIAL
17	Defendant.	
18		(Exhibit A Filed Under Seal)
19	Comes now the United States, by and through undersigned counsel, and hereby	
20	supplements the United States' Petition to Revoke (Doc. 267) release by alleging the	
21	following violations of his pretrial release as supported by the Declaration of FBI Special	
22	Agent Troy Cofer, attached as Exhibit A:	
23		
24	1. Defendant shall not commit any federal, state or local crime. (Doc. 17)	
25	There is probable cause that Harbour violated this term by engaging in witness	
26	tampering in violation Title 18 U.S.C. § 1512(b)(1). In sum, Harbour directed Kenneth	
27	Bobrow to contact victims in an effort to alter their testimony in exchange for payment of	
28	funds from a third party. (Ex. A; ¶s 10-25)	

1	2. Avoid all direct or indirect contact with persons who are considered alleged	
2	victim(s), potential witness(es), family members of victim(s)/witness(es), P.B	
3	M.B., R.T., J.C. and R.G. (Doc. 17)	
4	There is clear and convincing evidence that Defendant Harbour directed Kennet	
5	Bobrow to contact M.B. and R.T. between June 2020 and December 13, 2021. (Ex. A; ¶	
6	10-25)	
7	3. Defendant shall not solicit investors for any investment while on pretrial release	
8	(Doc. 17)	
9	There is clear and convincing evidence that Harbour solicited Kenneth Bobrow to	
10	invest \$141,000 into the purchase of XXXX Georgia for the benefit of Harbour. (Ex. A;	
11	30)	
12	4. The defendant shall not make any financial transactions totaling over \$1000.00 in	
13	any month to any person or entity without prior approval of Pretrial Services. Prio	
14	approval of Pretrial Services is not required for defendant's pre-established rents for	
15	residential purposes, attorney's fee, recurring payments, and his children's school	
16	tuition and activities. (Doc. 89)	
17	There is clear and convincing evidence that Harbour borrowed approximately	
18	\$1,950,000 without seeking prior approval from Pretrial Services. (Ex. A; ¶s 26-39)	
19	CONCLUSION	
20	Based on the forgoing, the United States moves the Court to conduct a hearing	
21	pursuant to 18 U.S.C. § 3148(b), and to revoke its current Order authorizing Harbour's	
22	release.	
23	Dated this 21st day of December, 2021.	
<ul><li>24</li><li>25</li></ul>	GARY M. RESTAINO United States Attorney District of Arizona	
26	District of Arizona	
27	s/ Kevin Rapp KEVIN M. RAPP	
28	COLEEN SCHOCH Assistant U.S. Attorneys	

**CERTIFICATE OF SERVICE** I hereby certify that on this 21st day of December, 2021, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and provided a courtesy electronic copy to all registered CM/ECF participants. s/Marjorie Dieckman U.S. Attorney's Office